

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Allentown Division

EDWARD THOMAS KENNEDY,
Plaintiff,

Case No. 18-cv-977 (CDJ)

-v-

JOSEPH N. HANNA, et. al.,
Defendants.

MEMORANDUM IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT

1. Plaintiff wishes the court of record to render a summary judgment against defendants as authorized by Federal Rule of Civil Procedure 56, Federal Rules of Evidence and the Law of this Case, Exhibit 1 and detailed in Exhibits previously filed, and now Exhibit 4, Evidence That is Self Authenticating under Federal Rules of Evidence rule 902 (2), Certified Documents by Public Official Andrea E. Naugle, Lehigh County Clerk of Judicial Records that is *prima facie* evidence that Defendant Hanna has no Elected Official Commission and Bond recorded in his full legal name.¹²

¹ From *ANDREA E. NAUGLE LEHIGH COUNTY CLERK OF JUDICIAL RECORDS*,

I hereby CERTIFY that this document is
Recorded in the Recorder of Deeds Office
of Lehigh County, Pennsylvania

Instrument Number - 2016000009, Recorded On 1/4/2016 At 8:55:39 AM

* Instrument Type - ELECTED OFFICIAL COMMISSION AND

BOND Invoice Number - 259232 User ID: LJS

* Grantor - PENNSYLVANIA COMMONWEALTH OF

* Grantee - HANNA, JOE

* Customer - JOE HANNA

* Recorder of Deeds Division

* Deborah A. Casciotti, Chief Deputy Lehigh County Courthouse

* 455 W. Hamilton Street - Room 122 Allentown, PA 18101-1614 (610) 782-3162

TAKE JUDICIAL NOTICE

2. Pursuant to Federal Rules of Evidence Rule 201 (c) (2), plaintiff requests this court, a court of record, to also notice the additional following necessary information:

3. Plaintiff is Edward Thomas Kennedy, one of the people of Pennsylvania, in this court of record, wishes a Summary Judgment against Defendants.

4. Attached Exhibit 4 is prima facie evidence that Defendant Hanna lacks a Bond of Office and a lawful Commission, and is therefore void in office with no authority or jurisdiction to arrest Kennedy or trespass Kennedy or imprison Kennedy, as he did, and other (probable) offenses against the plaintiff and we the people.

5. Exhibit 4 is prima facie evidence that Defendant Hanna lacks a Bond of Office and a lawful Commission, and is therefore void in office, and exceeded his authority and jurisdiction when he and his Swat team group injured the plaintiff in loss of rights.

6. By the law of the case, plaintiff wishes damages as expressed in US dollars for injury and damages of fifty million dollars (\$50,000.000.00) against said defendants proportioned equally without delay for a summary judgement.

C. Argument

7. Summary Judgment is proper in a case where there is no genuine issue of

² Full legal name is defined at 6 CFR 37.3 - Definitions. Full legal name means an individual's first name, middle name(s), and last name or surname, without use of initials or nicknames. Hanna uses a nickname "Joe" and not his full legal name, which is US Law.

material fact.³

8. Hanna was the elected official, ring leader and general manager who injured the plaintiff and is responsible for Planning, Organizing, Staffing, Directing, Coordinating, Reporting and Budgeting that injured the plaintiff with a fake warrant and a fake commission and a fake bond.

9. No Bond of office and No Commission means Defendant Hanna is void in office.

10. Hanna had no Commission and no Bond of Office when he both injured and damaged plaintiff Kennedy.

11. By right and by law, Kennedy is entitled to damages.

12. A plaintiff moving for summary judgment satisfies its burden by submitting summary judgment proof that establishes elements of his claim as a matter of law.⁴

13. Plaintiff shows that no reasonable trier of fact in a court of record could find other than for plaintiff Kennedy.⁵

14. Because there are no genuine issues of material fact on any element of plaintiff's notice and demand, and now with evidence presented in Exhibit 2 certified from County of Lehigh's own official records, plaintiff is entitled to summary judgment as a matter of US law which is common law. plaintiff may wish punitive damages at a later date for defendants were also sued in their individual capacities.

³ Fed. R. Civ. P. 56(c); Scott v. Harris, U.S. 127 S. Ct. 1769,1776 (2007); Celotex Corp. v. Catrett, 411 U.S. 317, 322,106 S. Ct. 2548, 2552 (1986).

⁴ San Pedro v. United States, 79 F.3d 1065,1068 (11th Cir. 1996).

⁵ Calderone v. United States, 799 F.2d 254,259 (6th Cir. 1986).

D. Law of the Case

15. Exhibit 1 Law of the Case previously filed in this case is incorporated herein and the Federal Rules of Civil Procedure and the Federal Rules of Evidence are the rules of the court of record in the above entitled court. The rules shall be construed and administered to secure the just, speedy, and inexpensive determination of this action, and plaintiff wishes this to be so as stated herein. The Judge and the modern attorneys in this matter have a fiduciary duty to the plaintiff to settle this matter without further delay.

E. Summary Judgment Evidence

16. In support of his motion, plaintiff notices the court of prima facie evidence in Exhibit 4, two pages, which are incorporated by reference into the motion.

Date: September 9. 2018

Respectfully submitted,

/s/ Edward Thomas Kennedy seal

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